

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MONIQUE DA SILVA MOORE,)	
MARYELLEN O'DONOHUE,)	
LAURIE MAYERS, HEATHER)	
PIERCE, and KATHERINE)	
WILKINSON on behalf of themselves)	Civ No. 11-CV-1279 (ALC) (AJP)
and all others similarly situated,)	
)	
PLAINTIFFS,)	
)	
v.)	
)	
PUBLICIS GROUPE SA and)	
MSLGROUP,)	
)	
DEFENDANTS.)	
)	

**DECLARATION OF SIHAM NURHUSSEIN IN SUPPORT OF PLAINTIFFS' RULE
72(a) OBJECTION TO MAGISTRATE JUDGE PECK'S
FEBRUARY 8, 2012 DISCOVERY RULINGS**

SIHAM NURHUSSEIN, an attorney duly admitted to practice law in the State of New York, in the Southern District of New York, states as follows:

1. My firm represents the Plaintiffs in the above-referenced action.
2. Annexed to this declaration as "Exhibit A" is a true and correct copy of the transcript of the hearing before Judge Peck on February 8, 2012, which contains the rulings that are the basis for Plaintiffs' Rule 72(a) Objections.
3. Annexed to this declaration as "Exhibit B" is a true and correct copy of ESI Protocol, adopted by Judge Peck on February 22, 2012, that Judge Peck Ordered the Parties to draft and submit after he made certain rulings from the bench on February 8, 2012.
4. Annexed to this declaration as "Exhibit C" is a true and correct copy of the cover letter sent by Plaintiffs to Judge Peck in advance of the February 8, 2012 hearing, dated January 25, 2012.

5. Annexed to this declaration as “Exhibit D” is a true and correct copy of the following article: Gordon v. Cormack et al., *Overview of the TREC 2010 Legal Track*, available at <http://trec.nist.gov/pubs/trec19/papers/LEGAL10.OVERVIEW.pdf>.
6. Annexed to this declaration as “Exhibit E” is a true and correct copy of the following article: Andrew Peck, *Search, Forward*, Law Technology News, October 1, 2011.
7. Annexed to this declaration as “Exhibit F” is a true and correct copy of the following article: Mikki Tomlinson, *The Honorable Andrew J. Peck on the Record with Predictive Coding: Early Headlines Get it Wrong!*, eDiscovery Journal, February 15, 2012, available at <http://edisccoveryjournal.com/2012/02/the-honorable-andrew-j-peck-on-the-record-with-predictive-coding-early-headlines-get-it-wrong/>.
8. Annexed to this declaration as “Exhibit G” is a true and correct copy of the schedule on January 30, 2012, of a panel discussion between the Honorable Andrew Peck, Partner and National eDiscovery Counsel for Defendant MSL’s counsel of Jackson Lewis, Ralph C. Losey, and Maura R. Grossman, Counsel at Wachtell, Lipton, Rosen & Katz, on the topic “Man vs. Machine: The Promise/Challenge of Predictive Coding and Other Disruptive Technologies” available at http://www.legaltechshow.com/r5/cob_page.asp?category_id=72043&initial_file=cob_page-ltech_agenda.asp

I DECLARE UNDER THE PENALTIES OF PERJURY THAT THE FOREGOING IS TRUE
AND ACCURATE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Dated: February 22, 2012

New York, New York

/s/ Siham Nurhussein

Siham Nurhussein